

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,

Plaintiff,

v.

1. CHARLES FREDDIE THOMPSON,
2. PATRICIA ANN THOMPSON,
3. DARRELL LEROY THOMPSON,
4. WILLIAM CLIFFORD BAKKEN,
5. ROBERT ANTONY INGEBRETSON, and
6. JAMES WILLIAM BRAUN, JR.

Defendants.

INDICTMENT **CR-10-114 JAT/RLE**

(18 U.S.C. § 371)

(18 U.S.C. § 2320(a))

THE UNITED STATES GRAND JURY CHARGES THAT:

COUNT 1

(Conspiracy to Traffic in Counterfeit Goods)

From in our about September 2007 through in our about December 2009, in the State and District of Minnesota and elsewhere, the defendants,

CHARLES FREDDIE THOMPSON,  
PATRICIA ANN THOMPSON,  
DARRELL LEROY THOMPSON,  
WILLIAM CLIFFORD BAKKEN,  
ROBERT ANTONY INGEBRETSON, and  
JAMES WILLIAM BRAUN, JR.

knowingly and intentionally conspired to traffic in goods, namely sports apparel, while knowingly using on and in connection with such goods counterfeit marks, the use of which counterfeit marks was likely to cause confusion, mistake, and deception, in violation of Title 18, United States Code, Sections 371 and 2320(a).

FILED **APR 21 2010**  
RICHARD D. SLETTEN, CLERK  
JUDGMENT ENTERED \_\_\_\_\_  
DEPUTY CLERK'S INITIALS \_\_\_\_\_

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United States v. Charles Freddie Thompson, et al.

OVERT ACTS

During and in furtherance of the conspiracy the defendants committed the following overt acts, among others:

1. On numerous occasions, Charles Freddie Thompson obtained counterfeit sports apparel from sources of supply in China. This included counterfeit NFL jerseys, counterfeit NHL jerseys, and counterfeit Nike sportswear.

2. Charles Freddie Thompson caused the shipments of counterfeit sportswear from China to be delivered to various properties in Minnesota owned or controlled by him.

3. On or about November 23, 2009, Darrell Leroy Thompson accepted 11 parcels at his residence containing a total of 155 items of counterfeit sportswear sent from China with the intention of transferring these goods to his son, Charles Freddie Thompson, for resale.

4. On or about November 23, 2009, Patricia Ann Thompson accepted delivery at her residence of nine parcels sent from China containing a total of approximately 133 counterfeit NFL jerseys.

5. On or about November 23, 2009, Charles Freddie Thompson possessed approximately 3,000 items of counterfeit sportswear at his residence in Long Prairie, Minnesota.

6. Charles Freddie Thompson paid for the counterfeit sportswear by sending Western Union transfers to his sources of supply in

United States v. Charles Freddie Thompson, et al.

China. He recruited other persons to send the money using their names in order to avoid detection. He also instructed these senders to keep the amounts below \$2,500 in order to avoid currency reporting requirements.

7. From on or about October 18, 2007 through on or about January 16, 2009, Charles Freddie Thompson personally wired money to China for the payment of counterfeit sportswear approximately 50 times, in the total amount of approximately \$97,532.

8. Between January 22, 2008 and July 10, 2009, Patricia Ann Thompson personally wired money to China for the payment of counterfeit sportswear approximately 21 times, each in the amount of \$2,475, for a total of \$51,975.

9. Charles Freddie Thompson sold the counterfeit sportswear to his customers including William Clifford Bakken, Robert Antony Ingebretson, and James William Braun, Jr., knowing and intending that they would resell the counterfeit sportswear to unsuspecting purchasers.

10. From approximately September 2008 through on or about November 23, 2009, William Clifford Bakken purchased counterfeit sportswear from Charles Freddie Thompson on several occasions and resold it to others at a substantial markup.

11. From approximately December 2008 through November 2009, James William Braun, Jr. purchased at least 100 items of

United States v. Charles Freddie Thompson, et al.

counterfeit sportswear from Charles Freddie Thompson for resale at his store "Studio 52" in St. Cloud, Minnesota.

12. On December 1, 2009, Robert Ingebretson possessed approximately 127 items of counterfeit sportswear at his store "Sportsminded" in Alexandria, Minnesota, that he had previously purchased from Charles Freddie Thompson.

A TRUE BILL

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UNITED STATES ATTORNEY

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FOREPERSON